2nd 80s Fire

Waste Handling & Interim Storage Plan

04/01/2019

Approval:

Position	Name	Signature	Date
Incident Commander			
FOSC			
SOSC			

9966054

2nd 80s Fire
Deer Park, Texas
Waste Handling & Interim Storage Plan
Version 1.0

Intercontinental Terminals Company – Deer Park

30 March 2019

	Name, Position	Signature	Date
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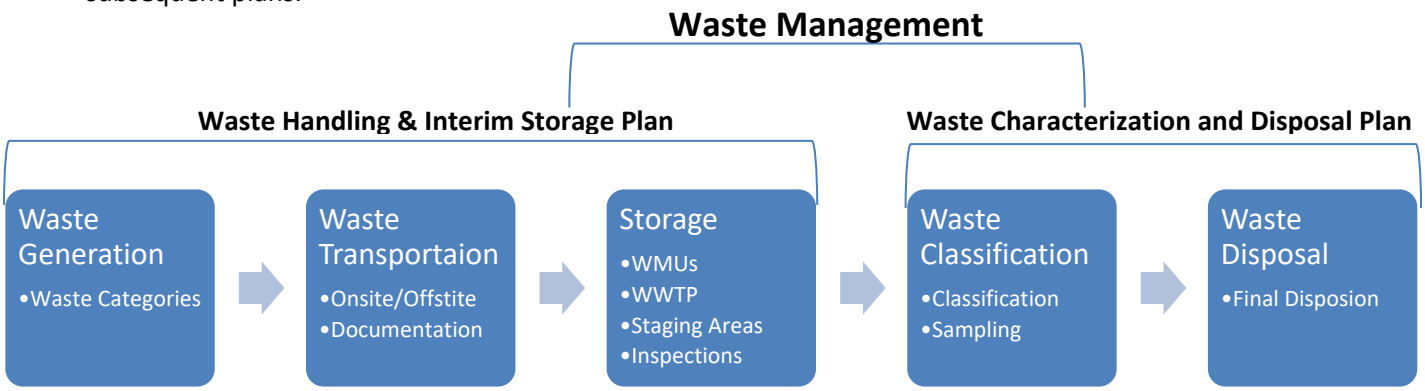
Waste Handling & Interim Storage Plan Management of Change

Change 001			
Description of Change (include sections & page numbers):			
	Name/Position	Signature	Date Signed
Prepared By:			
Approved By:			
Change 002			
Description of Change (include sections & page numbers):			
	Name/Position	Signature	Date Signed
Prepared By:			
Approved By:			
Change 003			
Description of Change (include sections & page numbers):			
	Name/Position	Signature	Date Signed
Prepared By:			
Approved By:			

1.0 Introduction and Purpose

The Waste Handling & Interim Storage (WHIS) Plan was prepared by Intercontinental Terminals Company, LLC. (ITC), supporting Unified Command (UC) to provide a plan for the onsite management of waste during the Emergency Response (i.e., the immediate response activities) to the 2nd 80's Fire (see **Attachment A** for general location). This plan will include only that which is necessary for generation, collection, transportation, and storage of hazardous waste, nonhazardous waste, and reclaimable/recyclable materials generated during the Emergency Response. Sampling analysis procedures and final disposition of the above mentioned materials will be covered in a separate plan(s). Please reference the process flow diagram below for the general outline of the WHIS Plan and subsequent plans.



This WHIS Plan establishes and describes procedures and protocols to be followed by responders for all spill response materials, recovered and generated. The plan provides for the management, transportation, and storage of the expected waste streams and categories that may be generated.

The collection, transportation, and storage of waste will be conducted in a manner that is both safe and environmentally sound and complies with applicable laws and regulations.

2.0 Health and Safety

The health and safety of all those involved is the most important consideration when implementing this plan. All site personnel will review and adhere to the incident Site Safety and Control Plan (ICS Form 208) and company/contractor specific Health and Safety Plans (HASP), as applicable. Daily tailgate safety briefings will be conducted prior to conducting field activities where hazardous, or potentially hazardous, waste is to be recovered. Additional safety briefings may be given prior to underrating

specific activities such as skimming operations, soil removal, sorbent swapping, etc. Specific field activities will only be performed under weather or other environmental conditions that do not create unsafe working conditions. The appropriate personal protecting equipment (PPE) will be utilized for each task as identified in the ICS Form 21A and task specific ICS Form 204s. Any incident will be promptly reported in accordance with the site-specific safety plan and UC objectives.

3.0 Waste Management Best Practices

The following best practices must be followed in the management of wastes generated in a spill response effort:

a) Manage wastes and recoverable materials in permitted or otherwise designated and authorized locations. Unauthorized storage and management will not be tolerated.
b) Obtain Safety Data Sheets (SDSs) for all known products and other incident derived materials (ex: fire-fighting foam) involved in waste management (the SDSs for the materials involved will be provided in **Attachment B**).
c) At the point of collection, all materials recovered will be presumed to be, and will be managed in accordance with requirements applicable to, hazardous waste. In the event safety considerations prevent the collection of samples at the point of collection for characterization of a recovered material to determine whether the material is hazardous waste, such sampling is to occur once safety concern have been eliminated. If UC determines there are significant safety issues, sampling will occur at the staging area where personnel can set up sampling collection stations and equipment decon areas and samples will be collected within 6 hours from the time the material arrives at the ITC site or other locations where the recovered materials will be first assessed for disposition. All recovered materials will be managed as hazardous waste until such a time that the results of the waste determination and classification conducted in accordance with this plan determines otherwise.
d) Reduce waste generation whenever practical. This is known as waste minimization or pollution prevention.
e) Reuse or recycle materials whenever practical. This not only lowers the consumptions of raw materials, it also eliminates the need for waste disposal. Recycling or reuse of recovered product and other recovered materials is the preferred option.
f) Prevent co-mingling of recovered materials or wastes of different types or classifications. For example, never place non-hazardous wastes in the same container as hazardous wastes. In addition, keep recyclable material separate from non-recyclable wastes. It may be difficult or impossible to separate wastes after they are co-mingled.
g) Maintain good housekeeping practices. Employees and contractors should maintain neat work areas, and clean-up areas to reduce need for additional clean-up of the associated materials or waste.

h) Properly store recovered materials and wastes, especially hazardous wastes, to inhibit and prevent releases to soil, water, or air, and to prevent consumption by wildlife until classification of the material can be confirmed and can be appropriately managed or disposed.
i) Clearly identify the contents of containers of recovered materials and waste. Use a label or other means to clearly identify the contents of containers of hazardous, nonhazardous, inert wastes, and other recovered materials to identify the start date of accumulation.
j) Document quantities and disposition of all hazardous and non-hazardous wastes as instructed in this plan. Tracking is required for all recovered materials. Waste tracking is required for all wastes. This information will be included in the final report delivered at the conclusion of response activities.
k) Recovered liquids (product, water, sludge) should be collected and stored in as large a container as possible (UN approved drum, tote, tank, truck, barge, etc.) to maximize dewatering potential, facilitate uninterrupted recovery, and to minimize equipment decontamination requirements. To the extent possible, recovered materials shall be segregated so that like materials are stored together and not comingled with dissimilar materials.
l) Communicate your ideas to the Operations Section Chief for waste minimization management improvements as well as supervisors and fellow employees in different areas.
m) Maintain security at all locations where recovered materials or waste is being stored.
n) The Environmental Unit (EU) is responsible for determining whether any regulatory permits (e.g. NPDES or plans (SWP3 or SPCC Plan) are required where waste is stored.

4.0 Generation

4.1 Potential Waste Categories

Waste Stream	Sources	Materials Generated
Non-Hazardous: Would be considered Class 1, Class 2, or recyclable material when documented via analysis		
Liquid Material	Skimming, vacuuming, water vessel decon, storm water, wildlife washing and decon	• Recovered or skimmed mixtures (diked area, Tucker Bayou, Ship Channel, Tanks) • Decon waters • Storm water potentially mixed with other materials • Waste from wildlife operations
Solids	Recovery and remediation operations, wildlife washing operations	• Sediment, vegetation, woody material, soils • Containers from wildlife decon operations • Empty foam totes

Sorbents	Recovery operations and wildlife washing operations	• Contaminated sorbent materials • Sorbents from wildlife decon operations
PPE	Worker protection	• Outer garments
General Trash	Daily activities	• Food and beverage debris
Hazardous: As determined by a waste characterization and analysis		
Characteristic	Recovered liquid material that has phase separated from recoverable product	• D001 water/foam mixture • D018 water/foam mixture
Listed	Waste water that has phase separated from recoverable product	• U239 water/foam mixture
Biohazards	Wildlife care	• Sharps

5.0 Transportation

5.1 Onsite Materials

Liquid materials will be pumped into 70 bbls and 130 bbl. vacuum trucks where feasible and transferred to onsite storage tanks 80-18 (WMU 040), 100-28 (WMU 039), and 100-31 (WMU 041). The vacuum trucks will be visually and continuously monitored by the operator as material is pumped into the tank. Great care will be taken while conducting connecting and disconnecting operations to prevent the release of material during such operations.

5.2 Offsite Materials

Materials collected offsite will be managed under the provisions of 40 CFR 270.1(c) (3), 30 TAC 335.41(d) (2), and 30 TAC 335.93(b). These materials include, but are not limited to, boxes containing collected sorbents, vacuum trucks with liquid materials, drums/totes with liquid materials, decon solids, and trash/refuse. The material is to be recovered at an offsite location to be identified on the shipping papers, transported directly to the ITC site, and offloaded into tanks designated to hold the material in question or to be held in one of the temporary staging areas designated in ATTACHMENT D. Prior to being offloaded or staged, the transporter and a designated ITC representative will complete the "Emergency Response Shipping Paper"- which can be found in ATTACHMENT G. The materials will not be in possession or control of any party other than ITC prior to their return to the ITC site. The material will be assessed and the required waste determination and classification made at the ITC site in accordance with state and federal regulations prior to disposal or recovery. Once the immediate response ends, the onsite management of any material that is, or potentially is, hazardous waste will occur in accordance with the permit exemption conditions set forth in 40 CFR 262.17(a).

6.0 Storage

6.1 Waste Management Units

Any onsite storage tank that is to be used in this Emergency Response will follow the tank regulations set forth in 40 CFR Parts 264/265, Subpart J. Once all materials have been removed, the applicable tank closure guideline will be followed and documented before the tank is allowed to reenter product storage service.

Liquid materials recovered will be managed as described in section 5.1.

6.2 Waste Water Treatment Plant

No recovered materials determined to be hazardous waste will be managed by the onsite WWTP. All liquids contained in chemical and storm drains, as well as outfalls, will be removed with a vacuum truck and transferred into one of the three designated onsite storage tanks. All drains leading to the WWTP will remain closed until such a time that the treatment plant can reopen (this determination is currently being made with UC and other state and federal agencies, and is undetermined at this time), and any additional water/product will be removed in the same manner.

6.3 Staging Areas

Several staging areas for solid materials have been identified, and a complete list along with a map can be found in Attachment D. A copy of this plan will be available at each staging area.

Bagged class 1 and hazardous waste must be segregated to prevent mixture and disposed of in separate roll off containers.

6.4 Staging Area Log Example

Date Onsite	Date Full	Date Offsite	Contractor	Type	Location	Container No.	Product	Tank #	Customer	Notes/Comments
			Cameron	RO	4 Dock	2006	Copper	*	ITC	Road leading to the 1 dock
			Sprint	RO	S. Drum Shed	4154	Debris	*	ITC	From construction, south of 4th 100's

7.0 Material Management

Description of Material	Waste Category	Method of Removal	Storage	Potential Disposal Locations
Contaminated Water/ Recoverable Product	Hazardous Liquid Waste (classification TBD by waste determination), Recoverable product	Pump to vac trucks (removed from outfalls, drains, ditch, bayou, and various locations along the channel)	80-18, 100-28, 100-31, barges, other portable containers	Clean Harbors, TX Intergulf, TX US Ecology, TX Recovery: TBD
Uncontaminated Household Trash	Non-hazardous Waste	Dumpsters provided by Waste Management	Various Staged Locations	Waste Management (WM)
Solids/Debris/Sorbent Materials/Soil	Class 1 or/ Hazardous Waste (classification TBD by waste determination)	Poly Lined Roll Off Containers	Various Staging Areas	HPP, TX Rineco, AR US Ecology, TX
PPE	Class 1 or/Hazardous Waste (classification TBD by waste determination)	Poly Lined Roll Off Containers	Various Staging Areas	Waste Management, TX Rineco, AR
Other Materials Identified as Hazardous Waste	Hazardous Solid Waste (classification TBD by waste determination)	Poly Lined Roll Off Containers	Various Staging Areas	Rineco, AR US Ecology, TX
Contaminated Water from Wildlife Rehabilitation and Decon Operations	Class 1 or Class 2 Waste (classification TBD by waste determination)	Totes/ 55 gal. Poly Drums	90 Day Drum Storage Area (WMU 018)	Philips SteriCycle, TX
Solid Waste from Wildlife Operations	Class 1 or Class 2 Waste (classification TBD by waste determination)	55 gal. Poly Lined Metal Drums	90 Day Drum Storage Area (WMU 018)	Philips SteriCycle, TX
Biohazards	Hazardous Waste	55 gal. Poly Drum	90 Day Drum Storage Area (WMU 018)	

8.0 Documentation and Storage Area Controls

The Hazardous Waste Operator or other environmental operator employed by ITC will be responsible for coordinating all daily waste stream activities. Coordination activities include, but are not limited to, the following:

- Perform special projects and other tasks requested by ITC.
- Continually analyze situations and make or recommend judgmental decisions to maintain Customer assets in the best safety, compliance and business position possible.

- Perform daily inspections to ensure that all tank and containers are in good condition, boxes are not leaking, boxes are properly tarped and free of liquids that could cause delays or problems during shipment and notify the Environmental Supervisor and/or other persons/individuals listed in section 9.0 when containers need to be overpacked or the contents transferred to a more suitable container. This is in accordance with 40 CFR 265.170-174. Report any discrepancies. This process will be documented using the checklist provided in Attachment F.
- Inspect all containers and confirm labels are in place, complete, and correct prior to the loading of the transportation vehicle to ensure that the load(s) will be received at the disposal facility without discrepancy.
- Continually look for ways to reduce the total waste stream.
- Assist with the identification, inventory, and proper storage of all waste materials at waste staging areas.

Daily verbal reports are to be provided for the following:

- Quantity of each category of waste generated for that operational period;
- Quantity of each category of waste stored on site; and
- Quantity of each category of waste transferred.

Waste at the consolidation sites will be controlled when entering and leaving the staging areas. The following form will be used to document waste management. This form is to be updated at least once daily and forwarded at the end of the week to the environmental team.

8.1 Records Management

Records management refers to the procedures for generating, controlling, and archiving project-specific records and records of field activities. Project records, particularly those that directly support current or ongoing technical studies and activities, provide historical evidence needed for later reviews and analyses, or are anticipated to be used as evidentiary data, will be legible, identifiable, retrievable, and protected against damage, deterioration, or loss on a centralized electronic database. Handwritten records will be written in indelible ink. Records will likely include, but are not limited to, the following: Ground field notebooks on pre-numbered pages, sample collection forms, personnel qualification and training forms, sample location maps, equipment maintenance and calibration forms, chain of custody forms, maps and drawings, transportation and disposal documents, including waste manifests and bills of lading), reports issued as a result of the work, procedures used, correspondences, and any deviations from the procedural records. Documentation errors will be corrected by drawing a single line through the error, so it remains legible and will be initialed by the responsible individual, along with the date of change, and the correction will be written adjacent to the error.

All hazardous waste will be shipped on a hazardous waste manifest in compliance with RCRA. These waste manifests will be retained for 3 years.

8.2 Inspection checklists for containers/tanks

All tanks that are storing materials that are presumed or determined to be hazardous wastes must follow the inspection guidelines set forth in 40 CFR Parts 264/265, Subpart J. All tanks must be inspected monthly in accordance with the ITC site SPCC plan, and a checklist for this plan can be found in **Attachment F**.

Attachment F contains the supporting checklist for the inspection of all containers containing materials that are or are presumed to be hazardous wastes. This inspection is to be done and documented daily by a member of the ITC environmental department.

9.0 Additional Assistance

If additional help or assistance is required, immediately contact the on-scene safety, Hector Cadena – Lead Safety, or environmental representative, Hunter Willis – Environmental Systems Supervisor, Mike Gaudet – Environmental Compliance Manager, or contact Carl Holley – VP of SHES, Regulatory Compliance, and Safety, or David Wascome – VP of Operations. Upon request and as necessary, 24-hour contact information will be available.

Attachment A: General Incident Location

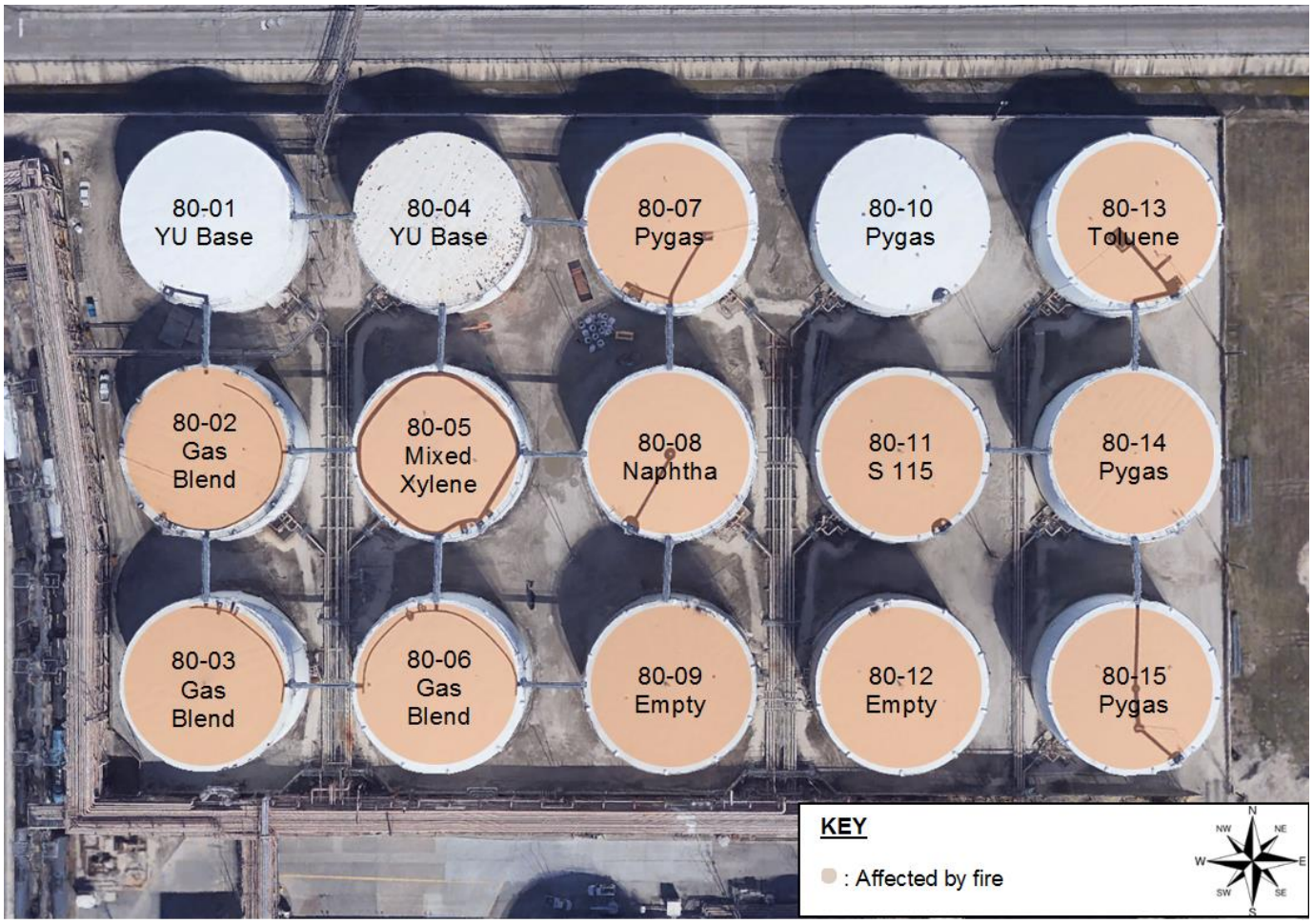


Figure 1: Tank farm affected by fire. NOTE: Not all containers that were affected leaked product.

Attachment B: Product Safety Data Sheets (SDSs)

Attached are the SDS's for the following products/tanks:

- Gasoline Blendstock
  - 80-02
  - 80-03
  - 80-06
- Mixed Xylene
  - 80-05
- SN 115 (Base Oil)
  - 80-11
- Pyrolysis Gasoline
  - 80-07
  - 80-14
  - 80-15
- Naphtha
  - 80-08
- Toluene
  - 80-13
- Universal Gold AR-FFF
- Other Foams
  - Purple K - ANSUL
  - Dry Chemical Extinguishant - AMEREX
  - Signature Series VSP (Vapor Suppressant Product) – US FIRE PUMP
  - Universal Plus 3%/6% AR-AFFF – NATIONAL FOAM
  - PhosCheck 1x3 AR-AFFF – PERIMETER SOLUTIONS
  - PhosCheck 3% AFFF - PERIMETER SOLUTIONS
  - PhosCheck 3x3 AR AFFF - PERIMETER SOLUTIONS
  - PhosCheck 3x6 AR AFFF - PERIMETER SOLUTIONS
  - Arctic 3x3% ATC Foam Concentrate - SOLBERG
  - Arctic 3% AFFF Foam Concentrate - SOLBERG
  - Arctic 1x3% ATC Foam Concentrate – SOLBERG
  - ANSULITE 3% AFFF – ANSUL
  - ANSULITE 3X3 AR-AFFF – ANSUL
  - ANSULITE 3X6 AR-AFFF – ANSUL
  - ANSULITE Low Viscosity 3x3 AR-AFF Foam Concentrate – ANSUL
  - Dwight P. Williams Signature Series 1%x3% - SIGNATURE SERIES FOAM
  - Thunderstorm W813A 1x3 AR-AFFF – WILLIAMS FIRE & HAZARD CONTROL

Attachment C: Situation Maps (1 of 3)

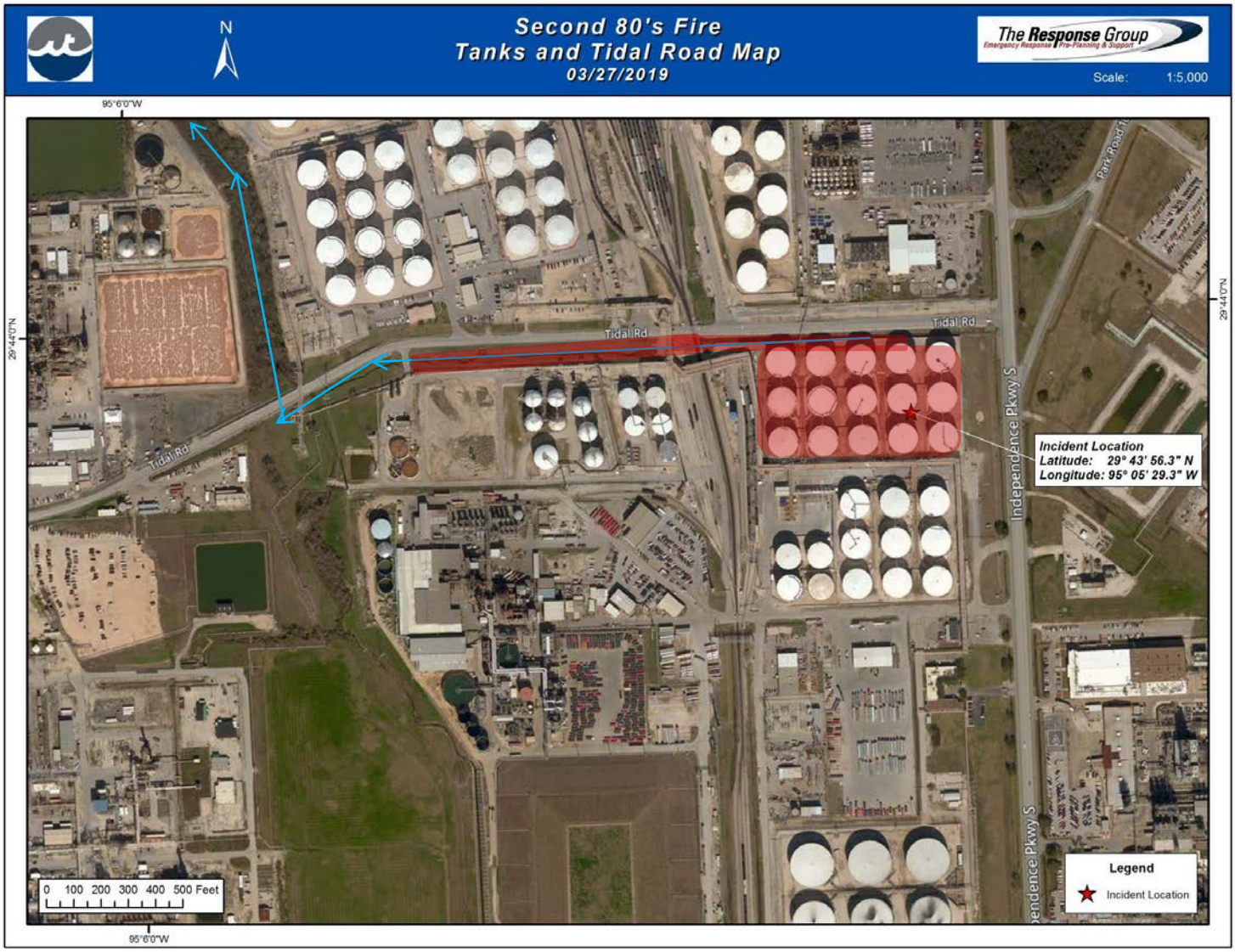
Figure 2: This image encompasses the current booms deployed, as well as shorelines that were impacted by the event.

Attachment C: Situation Maps (2 of 3)

KEY:

Areas affected by fire

Flow of water/product from dike wall breach



Attachment C: Situation Maps (3 of 3)

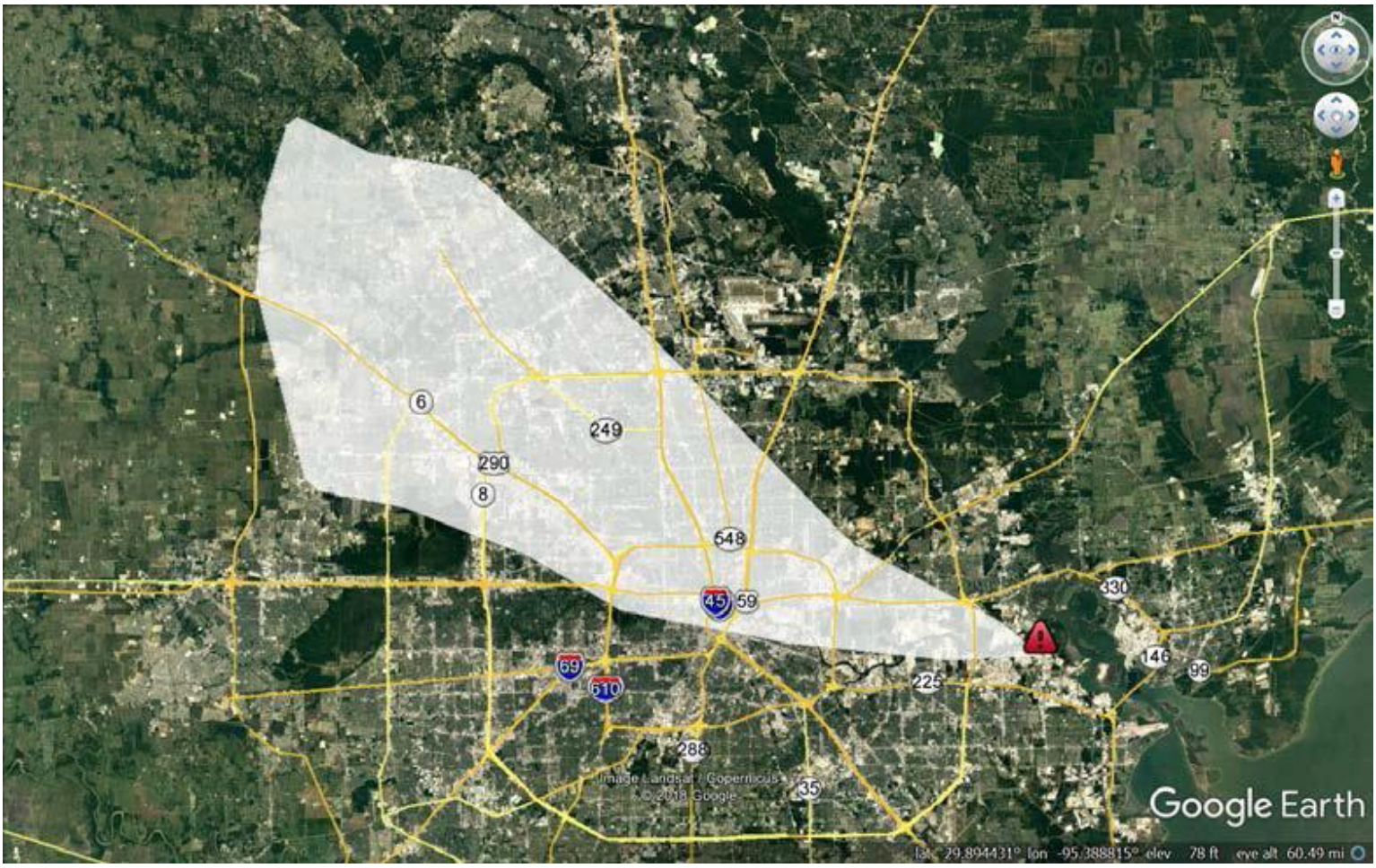


Figure 4: Map of smoke plume from "Field Report of Airborne Data Collected In Support of US EPA Region VI Intercontinental Terminals Company LLC Fire 19 March 2019".

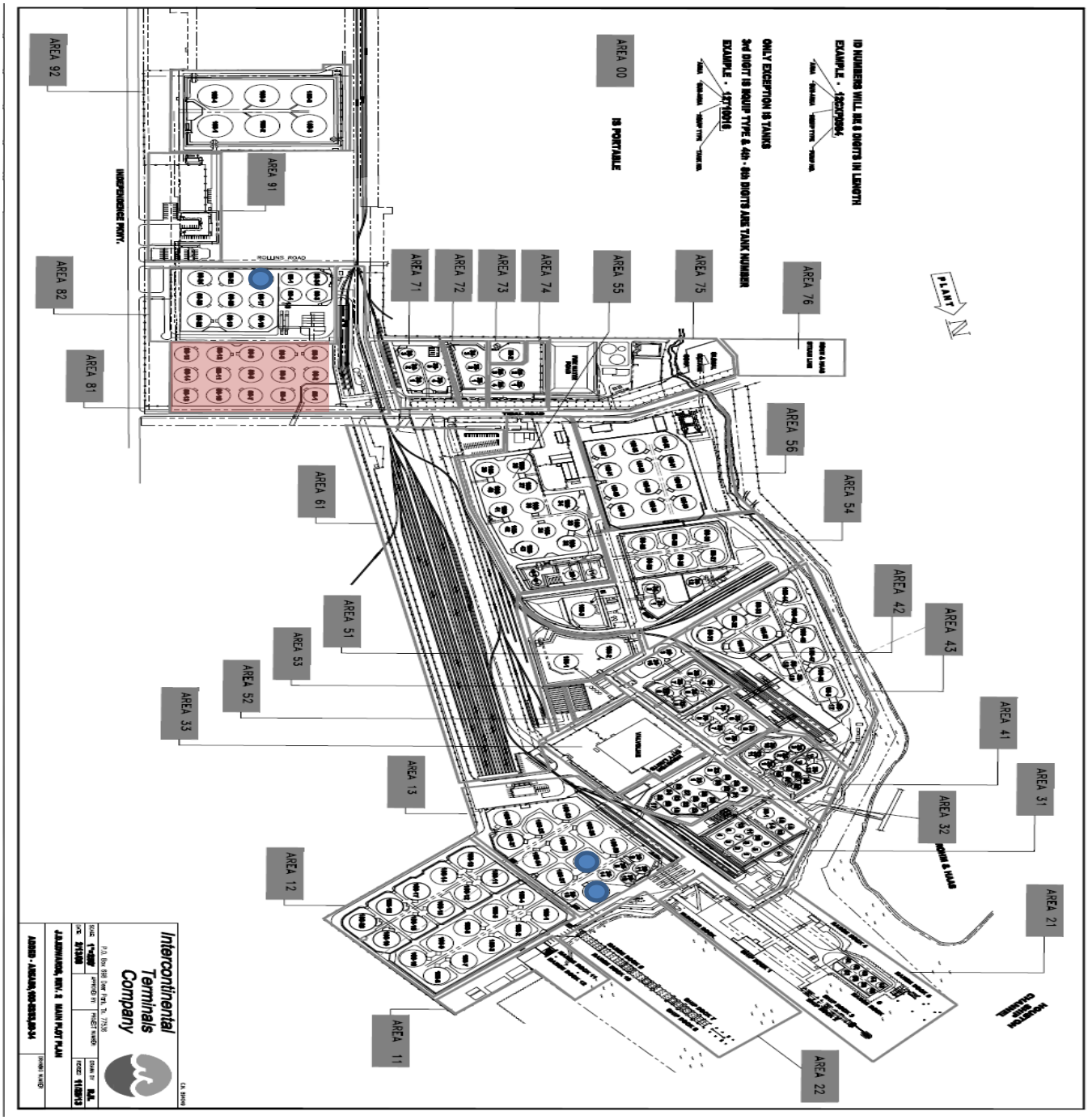
Attachment D: Staging Areas for RO Boxes

Attachment E: Temporary Storage Unit Tanks

KEY:

Temporary Storage Tanks (80-18 WMU 040 is nearest to incident, 100-31 WMU 041 is northernmost)

Incident Area



Attachment F: Inspection Checklists (Daily Container Inspection) 1 of 2

Inspection Information			
Date:			
Time:			
Inspector and initials:			
Hazardous Waste Containers	**Y/N**	**Corrective Action**	**Other Comments**
Are the containers properly and clearly labeled?			
Are the containers tightly closed?			
Is there any evidence of deterioration?			
Are the incompatibles separated?			
Are there any signs of leaks or spills?			
Is the area around the containers clear of debris?			
Is spill response equipment accessible?			
Are the roll tarps damaged or worn?			
Are the straps damaged or worn?			
Are the bungee cords cracked or damaged?			
Is there adequate isle space to conduct inspections?			
Are there any high readings in the area where the containers are being stored? If yes, please note reading type and measurement.			

Attachment F: Inspection Checklists (SPCC Monthly Tank Inspection) 1 of 2

Attachment G: Shipping Papers for Offsite Materials